

**Norlite 2017 CfPT Plan
NYSDEC Comments**

1. **Section 2.0:** The past 12-month average backend kiln temperature value in table 2-4 for Kiln 1 does not meet the minimum required NOC value of 866 F. Note that 40 CFR Part 63.1207(g)(2)(ii) states that the average value must not include data obtained when not burning hazardous waste. Explain why these variations from the permitted limit have not been reported as exceedances in the excess emissions reports or as deviations in the semi-annual and annual compliance certification reports.
2. **Section 4.6:** The Fluid Components International gas flow meters listed in Table 4-3 appear to be the old flow meters. Please revise the table to list the new optical flow sensors for the kilns.
3. **Appendix A, Kiln 1 Process Data:** Is the Kiln Pressure Max Reading column indicative of the Title V condition #126 OPL maximum front and back end kiln pressure; simultaneously (0.00 in H₂O/ instantaneous)?